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The Honorable Timothy W. Dore  
Chapter 7  
Hearing Location: Telephonic  
Hearing Date: March 26, 2021  
Hearing Time: 9:30 a.m.  
Response Date: March 19, 2021

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In Re: ) Chapter 7  
NICHOLAS CLIFTON BARNARD ) No. 20-11870  
Debtor. )  
OBJECTION TO CLAIM  
AND NOTICE OF HEARING

Ronald G. Brown, Trustee, objects to the following claim and asks that the court deny the following claim for the reasons as follows:

Claim No.	Claimant	Reasons
11 ( Twice Amended)	Benjamin Schwartz	Claim and amended claims were not filed by claimant; debtor prematurely filed the claims which, pursuant to BR 3004, cannot be filed until 30 days after the claims bar date, which was 3/12/21, if claimant does not file a claim pursuant to BR 3004. Claims were filed with a statement of the claim which is inadequate to evaluate the claim. The lack of adequate supporting documentation does not allow the Trustee to ascertain the extent that the claim qualifies for the class of claim asserted in the proof of claim, that it constitutes a liability of the estate, or that it may allow an evaluation by the Trustee to determine the extent, if any, of applicable defenses to the claim. Thus, the claim should be disallowed in full. If prior to the response date to this objection, claimant files satisfactory supporting documentation, the Trustee will consider modifying or withdrawing his objection.

DATED this 16th day of February 2021.

/s/ Ronald G. Brown  
Ronald G. Brown, WSBA #8816  
Chapter 7 Trustee

OBJECTION TO CLAIM AND NOTICE OF HEARING - 1

RONALD G. BROWN  
ATTORNEY AT LAW  
2525 WELLS FARGO CENTER  
999 THIRD AVENUE  
SEATTLE, WASHINGTON 98104  
(206) 342-7850 TELEPHONE  
(206) 341-7850 FACSIMILE

## NOTICE OF HEARING

**TO ABOVE-NAMED CLAIMANT:**

YOU ARE HEREBY NOTIFIED that the foregoing claim objection will be heard by the court as follows:

Judge: Timothy W. Dore:  
Date: March 26, 2021  
Time: 9:30 a.m.  
Location: Telephonic  
Dial: 1-888-363-4749  
Enter Access Code: 2762430#  
Press the # sign  
Enter Security Code when prompted: 5334#  
Speak your name when prompted

## OBJECTIONS/RESPONSES

Any responses to the Objection to Claim must be in writing, with the original filed with the Clerk of the Bankruptcy Court, Room 6301, 700 Stewart Street, Seattle, Washington 98101, prior to the response date which is March 19, 2021. Failure to comply with this local rule may be deemed by the court as opposition without merit. If you are an attorney, your response must be filed electronically on the Court's CM/ECF system. A copy should be delivered to the chambers of the judge hearing this matter, a copy served on the United States Trustee, Room 5103, 700 Stewart Street, Seattle, Washington 98101, and a copy served on the Trustee at the address shown in the lower right hand corner of this Notice or via ECF. If responsive pleadings are not filed as stated above, the hearing may be stricken and an order denying claim may be presented, without further notice, to the court ex-parte prior to the scheduled hearing.

THIS NOTICE MAY AFFECT YOUR RIGHTS. YOU SHOULD READ THIS DOCUMENT CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY IF YOU HAVE ONE IN THIS CASE. IF YOU DO NOT HAVE AN ATTORNEY FOR THIS CASE, YOU SHOULD CONSULT ONE.

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OBJECTION TO CLAIM AND NOTICE OF HEARING - 2

RONALD G. BROWN  
ATTORNEY AT LAW  
2525 WELLS FARGO CENTER  
999 THIRD AVENUE  
SEATTLE, WASHINGTON 98104  
(206) 342-7850 TELEPHONE  
(206) 342-7851 FACSIMILE  
Page 2 of 3

CERTIFICATE OF MAILING

2 I CERTIFY under penalty of perjury, that I caused a copy of the foregoing Objection to  
3 Claim and Notice of Hearing to the following persons or entities at the below stated addresses,  
4 by first class mail, postage prepaid, on the 16th day of February, 2021, as follows:

5 Benjamin Schwartz  
210B 26th Avenue East  
6 Seattle, WA 98112

7           Nicholas Barnard  
8           6806 Oswego Place NE, #101  
          Seattle, WA 98115

9 Dated this 16th day of February, 2021.

/s/ Alexandra A. Hagans  
Alexandra A. Hagans

OBJECTION TO CLAIM AND NOTICE OF HEARING - 3

RONALD G. BROWN  
ATTORNEY AT LAW  
2525 WELLS FARGO CENTER  
999 THIRD AVENUE  
SEATTLE, WASHINGTON 98104  
(206) 342-7850 TELEPHONE  
(206) 342-7850 FACSIMILE  
P.O. Box 3